

HEARING DATE: FEBRUARY 17, 2011 AT 10:00 A.M.
RESPONSE DEADLINE: FEBRUARY 3, 2011 AT 4:00 P.M.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
	: Case No.: 05-44481(RDD)
DPH HOLDINGS CORP., <i>et al.</i> ,	: (Jointly Administered)
	:
Reorganized Debtors	:
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	:
DELPHI CORPORATION, <i>et al.</i>	:
	:
Plaintiffs,	: Adv. Pro. No. 07-02147-RDD
vs.	:
	:
ACORD INC.	:
	:
Defendant.	:
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**ACORD HOLDINGS, LLC'S JOINDER TO MOTIONS FOR RELIEF FROM
FOURTH ORDER EXTENDING TIME TO SERVE COMPLAINT**

Acord Holdings, LLC¹ ("Acord Holdings"), by its counsel, Carson Fischer, P.L.C.,
joins and adopts the motions of ATS Automation Tooling Systems Inc. [Docket No.

¹ Acord Inc., the named defendant in the above-captioned adversary proceeding, is a dissolved corporation. Acord Holdings is a successor in interest to certain assets previously held by Acord Inc. prior to its dissolution. On September 7, 2010, Reorganized Debtors filed a *Motion For Leave to File an Amended Complaint* (the "Motion to Amend"). The Motion to Amend seeks, in part, to add Acord Holdings as an additional defendant in the above-captioned adversary proceeding. On November 24, 2010, Acord Holdings filed its *Brief in Opposition to Reorganized Debtor's Motion for Leave to File Amended Complaint* (the "Brief") [Docket No. 20906]. The Motion to Amend is pending. By filing this joinder, Acord Holdings does not acknowledge or admit that it is the proper defendant in the above-captioned adversary proceeding or that it is liable for any obligations that may be owed by Acord Inc. and reserves all rights with respect to any defenses available to it.

20699²], Doshi Prettl International [Docket No. 20701], the Timken Company and the Timken Corporation [Docket No. 20719] and all other motions (the “Motions”) filed by defendants in avoidance actions in the above-captioned bankruptcy proceeding seeking to vacate the (i) *Order Pursuant to Fed. R. Bankr. P. 7004(a) and 9006(b)(1) and Fed. R. Civ. P. 4(m) to Extend Deadline to Serve Process for Avoidance Actions Filed in Connection With Preservation of Estate Claims Procedures Order* [Docket No. 18999] (the “Fourth Extension Order”) and (ii) earlier extension orders entered by the Court [Docket Nos. 9105, 12922 and 13484]. In the interest of legal and judicial efficiency, Acord Holdings will not reiterate the arguments which have already been made in the Motions. Instead, Acord Holdings hereby incorporates by reference, as if fully set forth herein, the arguments and requests for relief set forth in the Motions, to the extent they are applicable to Acord Holdings³.

WHEREFORE, Acord Holdings respectfully requests that the Fourth Extension Order be vacated or set aside and that Acord Holdings be granted such other and further relief as the Court deems just and proper.

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Dated: January 21, 2011

² The docket references contained herein are to the lead bankruptcy case docket.

³ In its Brief, Acord Holdings joined in the motions to vacate that were filed by other defendants in avoidance actions in the above-captioned bankruptcy proceeding and expressly moved to have the extension orders, including the Fourth Extension Order, vacated. This joinder shall not be deemed to waive, impair or otherwise negate any factual or legal arguments set forth in the Brief and Acord Holdings expressly preserves each of the factual and legal arguments set forth in the Brief.